



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 10, 2025

BY ECF

Hon. Jesse M. Furman
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *ACLU et al. v. U.S. Immigration and Customs Enforcement et al.*,
No. 24 Civ. 7290 (JMF)

Dear Judge Furman:

This Office represents the defendant agencies in the above-referenced action brought under the Freedom of Information Act. I write respectfully on behalf of all parties pursuant to the Court's order of December 10, 2024, ECF No. 38, to provide the Court with a status update on the agencies' searches and productions.

- U.S. Immigration and Customs Enforcement completed additional searches and has now located approximately 2,000 pages of records, including some spreadsheets, some of which may be duplicates or nonresponsive; it will process these at the rate of approximately 500 pages per month and expects to make its first production later this month
- U.S. Department of Homeland Security was able to substantially narrow its search results by eliminating duplicates and conducting further searches within its initial results, and now expects to complete its processing of the documents it located later this month
- U.S. Department of State located approximately 21,000 pages of potentially responsive records, has begun processing them (at the rate of 450 pages every six weeks), and expects to make its first production in early February; the parties are discussing whether the scope of the search can be narrowed to decrease the volume of results
- U.S. Coast Guard still expects to complete its searches later this month
- U.S. Navy completed its searches and made its production on December 20, 2024
- U.S. Citizenship and Immigration Services completed its searches which located approximately 40,000 pages of potentially responsive records, and made its initial production on December 30, 2024; the parties are discussing whether the scope of the search can be narrowed to decrease the volume of the remaining results

The parties will submit their next monthly report on February 10, 2025. We thank the Court for its attention to this matter.

Respectfully,

EDWARD Y. KIM
Acting United States Attorney

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cc: Counsel for plaintiffs (by ECF)